

FRESH PRODUCE ASSOCIATION OF THE AMERICAS

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Standardization Section, Fresh Products Branch

Fruit and Vegetable Programs

Agricultural Marketing Service

U.S. Department of Agriculture

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The Fresh Produce Association of the Americas (FPAA) supports the efforts of the U.S. Department of Agriculture to modify the U.S. standards for grades of greenhouse tomatoes in order to significantly improve the efficiency of inspections for greenhouse tomatoes. In addition, the FPAA would like to identify areas in the greenhouse tomato industry that have evolved since the last revisions in 1966.

The FPAA is a U.S. trade association representing U.S. companies involved in the growing, packing, importing, and marketing of greenhouse tomatoes grown in Mexico. The FPAA was founded in 1944 and is headquartered in Nogales, Arizona.

It is our understanding from David Priester that the deadline for comments relating to the standard was delayed to allow for the industry to discuss the proposal further at the recent North American Tomato Trade Working Group meetings held earlier this month. We believe that the extension has allowed us to make better and more representative comments on behalf of the industry that the FPAA represents. Thank you for your understanding and acceptance of our comments.

The FPAA does support the proposed change to amend the method for determining percentages of defects from a weight to a count basis. The FPAA believes that this would significantly speed the inspection process for greenhouse tomatoes with no change to the integrity of the inspection process.

The FPAA at this time does not support the idea of going to a size classification based on a diameter calculation. Given variations in the ratio of diameter to height found in the various varieties of greenhouse tomatoes, a move to using circumference would fail the goal of having more consistency in sizing. Measuring circumferences on each tomato is also a time intensive process that would fail the goal of significantly reducing inspection time and complexity. The FPAA recommends investigating a way to use the existing count sizes used on the currently predominantly used one-layer box.

The FPAA would be concerned with changes to the standard that would define a particular technology system for greenhouse tomatoes that would preclude the use of the term "greenhouse" for other producers. Many technological changes have occurred in greenhouse tomato production since 1966 and continue today at a rapid pace as the industry grows. For instance, the artificial addition of carbon dioxide or heating units in a greenhouse are not necessary in all regions and climatic conditions and do not affect the quality of the fruit itself. Thus, the FPAA would discourage USDA from imposing a definition of "greenhouse" through this standard if the definition focuses too much on any particular technology production system.

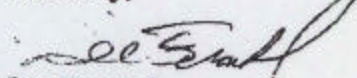
Likewise, the FPAA would not support efforts to limit the pack styles. Packaging styles continue to evolve to meet the demands of the trade and consumer; therefore, the FPAA would be opposed to any efforts to limit the grades to only a limited number of box dimensions or pack styles.

The FPAA also believes that the destination tolerances should be included as part of any review of the standards. Current standards calculate different tolerances based on length of trip for field tomatoes versus greenhouse tomatoes. The changes in the greenhouse varieties used today compared to 1966 would warrant an examination to see if the tolerances should be adjusted or not.

The FPAA offers its pledge to work with the USDA if it wishes to pursue modifications to the standards and definitions that would encourage types of greenhouse tomatoes beyond the "beefsteak" type to use the standard. Current grading definition and tolerances lead many producers at this point to not classify the product as to grade. The growth in non-beefsteak tomatoes has increased significantly over the last several years. In particular, the "tomato-on-the-vine" category now accounts for a significant portion of retail sales of greenhouse tomatoes. Likewise, there is significant growth in roma, "heirloom", and grape greenhouse varieties and production. The FPAA does not believe that specifications must be found for every theoretical contingency and potential variety; nonetheless, it may be a valuable exercise to find ways to update the standard to allow for more greenhouse tomato varieties to meaningfully use the standards. The standards can be a powerful commercial tool that can expand the pool of buyers and sellers of the product willing to do business with each other once there is a common set of definitions in use, regardless of origin or destination.

Thank you for your careful consideration of the comments of the FPAA.

Sincerely,



Lee Frankel
President, Fresh Produce Association of the Americas